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NATTO IYELA GBARABE, et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATTO IYELA GBARABE, et al.,
Plaintiffs,
v.
CHEVRON CORPORATION,
Defendant.

Case No. 14-cv-00173-SC

STIPULATION AND ~~PROPOSED~~
ORDER RE FILING OF FOURTH
AMENDED COMPLAINT

WHEREAS, five of the six named plaintiffs named in the Second Amended Complaint have been dismissed with prejudice;

WHEREAS, Defendant Chevron moved to dismiss or strike the Third Amended Complaint and the Court granted the motion to strike;

WHEREAS, Plaintiff Natto Iyela Gbarabe has prepared a Fourth Amended Complaint;

WHEREAS, the parties agree to the filing of the Fourth Amended Complaint, without waiving any of Chevron's rights, including without limitation, to bring motions under Federal Rules of Civil Procedure 11, 12 and 56.

NOW THEREFORE, the parties stipulate to the filing of the Fourth Amended Complaint.

Pursuant to Local Rule 5-1(i)(3), I, Robert A. Mittelstaedt, attest that concurrence in filing this document has been obtained from the other signatory.

Dated: September 28, 2015

Jones Day

By: /s/ Robert A. Mittelstaedt
Robert A. Mittelstaedt

Counsel for Defendant
CHEVRON CORPORATION

Dated: September 28, 2015

Rufus-Isaacs, Acland & Grantham LLP

By: /s/ Jacqueline Perry
Jacqueline Perry

Counsel for Plaintiffs
NATTO IYELA GBARABE, et al.

~~[PROPOSED]~~ ORDER

PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.

Dated: 09/30/2015

NAI-1500377837

